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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

WILLIAM SHELDON BEAVER,  
Plaintiff,

vs.

MARSHAL B. JOHNSON, P# 225, CLARK  
COUNTY, NEVADA; DISTRICT COURT  
MARSHAL'S OFFICE,  
Defendants.

Case No. 2:09-CV-02415-RLH-RJJ

**DEFENDANTS' MOTION TO SEAL  
EXHIBITS**

Defendants, MARSHAL B. JOHNSON, CLARK COUNTY, and DISTRICT COURT  
MARSHAL'S OFFICE ("Defendants"), by and through undersigned counsel, hereby request that  
Exhibits A, D, E and F attached to Defendants' Motion for Summary Judgment (Doc. #16), filed on  
March 25, 2011, in the above-entitled action, be sealed for the reasons set forth in the accompanying  
Memorandum of Points and Authorities.

Respectfully submitted this 31st day of March, 2011

CATHERINE CORTEZ MASTO  
Attorney General

By: /s/ Timothy F. Andrews  
TIMOTHY F. ANDREWS  
Senior Deputy Attorney General  
Nevada Office of the Attorney General

**MEMORANDUM OF POINTS AND AUTHORITIES****I. FACTS AND PROCEDURAL HISTORY**

Plaintiff William Beaver ("Plaintiff"), has an action pending in this Court against Clark County, its District Court Marshal's Office, and employee Marshal B. Johnson ("Defendants"). The action stems from an assault that Mr. Johnson allegedly committed on Plaintiff while Plaintiff was at the Family Court and Services Center on November 1, 2007. (Doc. #1-2). Defendants filed a motion for summary judgment on March 25, 2011 and inadvertently failed to redact certain personal information contained in Exhibits A, D, E and F to the motion (Doc. #16). Defendants now respectfully request that the Court issue an order sealing the aforementioned exhibits.

**II. LAW AND ANALYSIS**

Information regarding an individual's date of birth and social security number must be redacted from a document before it is filed with the Court. Fed.R.Civ.P. 5.2(a). In the instant case, Exhibits A, D, E and F all contain information that should have been but was inadvertently not redacted. In such circumstances, the appropriate remedy should be to seal the documents containing an individual's sensitive information. See *Rodriguez v. Niagara Cleaning Services, Inc.*, 2010 WL 3781295 (S.D.Fla.,2010)(unpublished opinion)(holding appropriate remedy for defendants' filing unredacted document is not to strike the pleading at issue but to seal those documents in the pleading that improperly allowed Plaintiffs' personal information to be viewed by the public).

1 **III. CONCLUSION**

2 Defendants regret the inadvertent disclosure of sensitive information included in the exhibits to  
3 their motion for summary judgment and respectfully request that the Court order Exhibits A, D, E and F  
4 attached to the motion (Doc. #16), be sealed so as to comport with Fed.R.Civ.P. 5.2.

5  
6 Respectfully submitted this 31st day of March, 2011.

7 CATHERINE CORTEZ MASTO  
8 Attorney General

9 By: /s/ Timothy F. Andrews  
10 TIMOTHY F. ANDREWS  
11 Senior Deputy Attorney General  
12 Nevada Office of the Attorney General

13  
14 IT IS SO ORDERED.

15   
16 CHIEF UNITED STATES DISTRICT JUDGE  
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18 DATED: March 31, 2011  
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**CERTIFICATE OF SERVICE**

I, hereby certify that I am an employee of the Office of the Attorney General and that on the 31st day of March, 2011, I served the foregoing **DEFENDANTS' MOTION TO SEAL EXHIBITS** by causing a true and correct copy thereof to be filed with the Clerk of the Court using the CM/ECF system and by causing to be delivered to the Department of General Services for mailing at Las Vegas, Nevada, a true copy thereof addressed to:

Robert J. Kossack, Esq.  
KOSSACK LAW OFFICES  
4535 W. Sahara Avenue, Suite 101  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiff*

/s/ Stacy K. Pinegar  
An employee of the Office of the Attorney General